



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

DEVAL L. PATRICK  
Governor

TIMOTHY P. MURRAY  
Lieutenant Governor

RICHARD K. SULLIVAN JR.  
Secretary

KENNETH L. KIMMELL  
Commissioner

February 4, 2013

Harry Wahra  
Irwin Industrial Tools Company d.b.a. Lenox  
Tools  
301 Chestnut Street  
East Longmeadow, MA 01028

Re: East Longmeadow  
Transmittal No.: X253755  
Application No.: WE-12-022  
Class: SUBMIN  
FMF No.: 539613  
**AIR QUALITY PLAN APPROVAL**

Dear Mr. Wahra:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Waste Prevention, has reviewed your Limited Plan Application ("Application") listed above. This Application concerns the proposed construction of a new steel wire processing operation at your Irwin Industrial Tools Company d.b.a. Lenox Tools ("Lenox Tools") facility located at 79 Industrial Drive in East Longmeadow, Massachusetts 01028.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control," regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner / operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

## **1. DESCRIPTION OF FACILITY AND APPLICATION**

Lenox Tools has submitted a limited plan approval application for the construction and operation of a new steel wire processing operation to be located at 79 Industrial Drive, East Longmeadow.

Lenox Tools designs, tests and manufactures power tool accessories, hand tools and band saw blades at their existing facility at 301 Chestnut Street, East Longmeadow. They are seeking to expand their operation into a ware house building located at 79 Industrial Drive, East Longmeadow. No manufacturing operations currently exist at this location. The building at 79 Industrial Drive will include the high speed wire drawing, forming and sizing manufacturing operations which are currently being performed at the 301 Chestnut Street facility.

### **Steel Wire Processing Operation**

At the 79 Industrial Drive facility, raw material steel wire, which has been purchased, will be processed through a variety of shaving, swaging, welding, grinding, heating and rinsing steps to form the required wire sizes and strengths for tooth tips. The finished wire will be sent to 301 Chestnut Street for use in the manufacturing of various saw blades. The specific steel wire processing steps will include the following:

- Coils of round steel wire received
- Ends swaged
- Shaving
- Swaging 2
- Butt-Welding/Grinding
- Aqueous cleaning
- Forced air dry
- Annealing electric furnace
- Borax quench
- Powder soap or oil lube
- Drawing Dies
- Repeat process starting at swaging 2 until finished round size passes through annealing
- Finish round wire to In-line cleaning process
- Acid cleaning –Uses 5% Sulfuric Acid ( $H_2SO_4$ ) Solution
- Water Rinse
- Alkaline rinse
- AccuCut 9050 as Rust Preventative
- Air blow-off
- To sizing lines
- Finished sized wire

Air contaminant emissions from the process will be volatile organic compounds (VOCs) which will be generated from the use of Accucut 9050. Other VOC emissions will be generated from the use of WD-40 and methyl ethyl ketone (MEK) in the bench top rebuild and cleaning area.

Accucut 9050 is a rust preventative and lubricant that will be used in the steel wire processing operation. The Accucut 9050 will be applied using a recirculated bath which will be completely enclosed except for where the material enters and exits the enclosure. It contains a maximum of 1.31 pounds of VOCs per gallon as applied and no hazardous air pollutants (HAPs) according to the

material safety data sheet (MSDS). Based on the Accucut 9050 maximum VOC content and a maximum usage of 43,526.69 pounds per year, the air contaminant emissions from the steel wire processing operation will not exceed 4.10 tons per year of VOCs.

WD-40 will be used as a cleaning material during bench top rebuilds of the carbide sizing rollers. It will also be used as a rust preventative/lubricant for the final reassembly of the turks head assemblies. The WD-40 will be directly applied using a plastic trigger spray bottle. According to the MSDS, WD-40 can potentially contain 100% by weight VOCs or 6.82 pounds of VOCs per gallon as applied and no HAPs. Based on the maximum WD-40 VOC content and a maximum WD-40 usage of 813.69 pounds per year, the air contaminant emissions will not exceed 0.41 tons per year of VOCs.

MEK, which is a VOC and not a HAP, will be used as a cleaning material during bench top rebuilds of the carbide sizing rollers. The MEK will be directly applied using a lab squeeze bottle and wiped off with a wiper. According to the MSDS, MEK contains 6.82 pounds of VOCs per gallon as applied. Based on the maximum MEK VOC content and a maximum MEK usage of 176.67 pounds per year, the air contaminant emissions will not exceed 0.09 tons per year of VOCs.

#### **Facility-Wide Emission Rates**

The company has requested to establish a facility-wide emission limit of 4.6 tons of VOCs in any 12 consecutive month period and 1 ton of total HAPs in any 12 consecutive month period.

#### **Regulatory Applicability**

The steel wire processing operation is subject to the best available control technology (BACT) requirements of 310 CMR 7.02(8)(a)2. In lieu of an emission-unit-specific top-down BACT analysis, an applicant may propose an emission control limitation by using one or more of the approaches contained in 310 CMR 7.02(8)(a)2.a. though c. 310 CMR 7.02(8)(a)2.b. allows for the proposal of an emission control limitation using a combination of best management practices, pollution prevention and a limitation on the hours of operation and /or raw material usage which is only available if the proposed allowable emissions are less than 18 tons of VOCs per 12 consecutive month period, less than 18 tons of total organic material HAP and less than ten tons of a single organic material HAP.

The facility has proposed to comply with the BACT requirements contained in 310 CMR 7.02(8)(a)2.b. by proposing VOC and HAP emission limitations which include limiting the VOC and HAP contents of coatings/materials and implementing work practices to minimize the evaporation of VOCs.

In addition to being subject to the BACT requirements of 310 CMR 7.02(8)(a)2., the facility is subject to the visible emission requirements of 310 CMR 7.06, the dust, odor, construction and demolition requirements of 310 CMR 7.09 and the noise reduction requirements of 310 CMR 7.10.

## 2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by the Plan Approval:

<b>Table 1</b>			
<b>EU#</b>	<b>Description</b>	<b>Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
1	Steel Wire Process	N/A	N/A
2	Bench Top Rebuild and Cleaning Area	N/A	N/A

**Table 1 Key:**

EU# = Emission Unit Number  
PCD = Pollution Control Device  
N/A = Not Applicable

## 3. APPLICABLE REQUIREMENTS

### A. OPERATIONAL, PRODUCTION AND EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2, below:

<b>Table 2</b>			
<b>EU#</b>	<b>Operational / Production Limit</b>	<b>Air Contaminant</b>	<b>Emission Limit</b>
1	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the Accucut 9050, or equivalent material as determined by MassDEP, shall not exceed 1.31 pounds of VOCs per gallon of material as applied and contain no HAPs. No additional VOC-containing materials shall be used in the steel wire process unless it is a substitute for the material indentified above and does not exceed the VOC and HAP content specified above.	VOC	≤1.0 ton per calendar month and ≤4.1 tons in any 12 consecutive month period
2	2. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the WD-40, or equivalent material as determined by MassDEP, and the methyl ethyl ketone, or equivalent material as determined by MassDEP, shall each not exceed 6.82 pounds of VOCs per gallon of material as applied and contain no HAPs. No additional VOC-containing materials shall be used in the bench top rebuild and cleaning area unless it is a substitute for the materials indentified above and does not exceed the VOC and HAP content specified above.	VOC	≤0.125 tons per calendar month and ≤0.5 tons in any 12 consecutive month period

Table 2			
EU#	Operational / Production Limit	Air Contaminant	Emission Limit
Facility-wide	None	VOC	≤4.6 tons in any 12 consecutive month period
		Total HAPs	≤1.0 tons in any 12 consecutive month period

**Table 2 Key:**

EU# = Emission Unit Number

VOC = Volatile Organic Compound

Total HAPs= Total Hazardous Air Pollutants

**B. COMPLIANCE DEMONSTRATION**

The Permittee is subject to, and shall comply with, the monitoring, testing, recordkeeping and reporting requirements as contained in Tables 3, 4 and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
Facility-wide	1. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13.

**Table 3 Key:**

EU# = Emission Unit Number

USEPA = United States Environmental Protection Agency

Table 4	
EU#	Recordkeeping Requirements
1	1. The Permittee shall maintain comprehensive and accurate records for EU #1 which shall include: <ul style="list-style-type: none"> <li>a. The identity of each volatile organic compound-containing and volatile hazardous air pollutant-containing material used in EU #1;</li> <li>b. The volatile organic compound content and total volatile hazardous air pollutant content in units of pounds per gallon for each material used in EU #1; and</li> <li>c. The amount of each volatile organic compound-containing and volatile hazardous air pollutant-containing material used during each month and in each 12 consecutive month period.</li> </ul>

<b>Table 4</b>	
<b>EU#</b>	<b>Recordkeeping Requirements</b>
2	<p>2. The Permittee shall maintain comprehensive and accurate records for EU #2 which shall include:</p> <ol style="list-style-type: none"> <li>The identity of each volatile organic compound-containing and volatile hazardous air pollutant-containing material used in EU #2;</li> <li>The volatile organic compound content and total volatile hazardous air pollutant content in units of pounds per gallon for each material used in EU #2; and</li> <li>The amount of each volatile organic compound-containing and volatile hazardous air pollutant-containing material used during each month and in each 12 consecutive month period</li> </ol>
Facility-wide	<p>3. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15<sup>th</sup> day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at <a href="http://www.mass.gov/dep/air/approvals/aqforms.htm#report">http://www.mass.gov/dep/air/approvals/aqforms.htm#report</a> .</p>
	<p>4. The Permittee shall maintain records of monitoring and testing as required by Table 3.</p>
	<p>5. The Permittee shall maintain a copy of this Plan Approval and the underlying Application approved herein on-site.</p>
	<p>6. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.</p>
	<p>7. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s), PCD(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.</p>
	<p>8. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.</p>
	<p>9. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.</p>

**Table 4 Key:**

EU# = Emission Unit Number

PCD = Pollution Control Device

USEPA = United States Environmental Protection Agency

<b>Table 5</b>	
<b>EU#</b>	<b>Reporting Requirements</b>
Facility-wide	<p>1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a “Responsible Official” as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).</p>

Table 5	
EU#	Reporting Requirements
	<p>2. The Permittee shall notify the Western Regional Office of MassDEP, BWP Air Permit Chief by telephone, [413-755-2115], email, [marc.simpson@state.ma.us] or fax [413-784-1149] as soon as possible, but no later than one (1) business day after discovery of an exceedance(s) of Table 2 requirements. A written report shall be submitted to Permit Chief at MassDEP within three (3) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).</p> <p>3. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30 days from MassDEP's request.</p> <p>4. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.</p> <p>5. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.</p>

**Table 5 Key:**

EU# = Emission Unit Number

BWP = Bureau of Waste Prevention

**4. SPECIAL TERMS AND CONDITIONS**

The Permittee is subject to, and shall comply with, the following special terms and conditions:

- A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
Facility-wide	<p>1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall comply with the following work practices:</p> <ul style="list-style-type: none"> <li>a. Store all VOC and/or HAP-containing materials, process-related waste materials and fresh and spent cleaning solvents in closed containers;</li> <li>b. ensure that mixing and storage containers used for VOC and/or HAP-containing materials and process-related waste materials are kept closed at all times except when depositing or removing these materials;</li> <li>c. minimize spills of VOC and/or HAP-containing materials and process-related waste materials;</li> <li>d. convey VOC and/or HAP-containing materials and process-related waste materials from one location to another in closed containers or pipes;</li> <li>e. minimize VOC and/or HAP emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that: (i) equipment cleaning is performed without atomizing the cleanup solvent; and, (ii) all spent solvent is captured in closed containers; and</li> <li>f. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing materials and process-related waste materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container.</li> </ul>

**Table 6 Key:**

EU# = Emission Unit Number

VOC = Volatile Organic Compounds

HAP = Hazardous Air Pollutant

- B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as “shanty caps” and “egg beaters.” The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

<b>Table 7</b>				
<b>EU#</b>	<b>Stack Height Above Ground (feet)</b>	<b>Stack Inside Exit Dimensions (feet)</b>	<b>Stack Gas Exit Velocity Range (feet per second)</b>	<b>Stack Gas Exit Temperature Range (°F)</b>
1	N/A	N/A	N/A	N/A
2	N/A	N/A	N/A	N/A

**Table 7 Key:**

EU# = Emission Unit Number

°F = Degree Fahrenheit

N/A= Not Applicable

## **5. GENERAL CONDITIONS**

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.



- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

## **6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT**

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain “Fail-Safe Provisions,” which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

## **7. APPEAL PROCESS**

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. The hearing request along with a valid check

payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts  
Department of Environmental Protection  
P.O. Box 4062  
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Cortney Danneker by telephone at (413) 755-2234, or in writing at the letterhead address.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

---

Marc Simpson  
Air Quality Permit Chief  
Bureau of Waste Prevention  
Western Region

cc: WERO AQ plan file  
WERO AQ approval file

ecc: Yi Tian, DEP Boston  
Peter Czapienski, DEP Western Region